



10/24/2017

Dear Mr. Payton,

The Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division (APCD) has identified two wildfire smoke ozone events in calendar year 2017 that will be considered for Exceptional Event status as defined by the Code of Federal Regulations (CFR) Title 40 Parts 50 and 51. These events occurred on September 2, 2017 and September 4, 2017. As per the September 30, 2016 revisions to the Exceptional Event rule (40 CFR 50.1, 50.14 and 51.930), the APCD is submitting this document in fulfillment of the Initial Notification of Potential Exceptional Event requirement to Region 8 Environmental Protection Agency (EPA) for consideration. These exceptional event exclusions are being pursued because of their relevance to Colorado's NAAQS non-attainment re-classification from "moderate" to "serious" under the 2008 Ozone Standard.

Preliminary investigations into these events show that the meteorology and the source fires contributing smoke are very similar, and that because of this, it is proposed that these events will be documented under a single report. The AQS event description will be as follows: "These two events (9/2/17 & 9/4/17) are sourced to the same Smoke from numerous fires in the northwestern United States, particularly from a few very large fires in Idaho and western Montana, was transported to the southeast and likely enhanced ozone concentrations in the northern Front Range region of Colorado." The below listed sites and data windows is a summary of all data that is associated with this AQS description.

Wildfire Smoke Events ("RT" Request Exclusion Flag)

9/2/17 Event

<i>Chatfield</i>	<i>(08-035-0004)</i>	<i>9/2/17, hour 9 to hour 17</i>	<i>Max 8hr O3 = 71</i>
<i>NREL</i>	<i>(08-059-0011)</i>	<i>9/2/17, hour 8 to hour 20</i>	<i>Max 8hr O3 = 76</i>
<i>RFN</i>	<i>(08-059-0006)</i>	<i>9/2/17, hour 10 to hour 19</i>	<i>Max 8hr O3 = 71</i>
<i>Welch</i>	<i>(08-059-0005)</i>	<i>9/2/17, hour 8 to hour 18</i>	<i>Max 8hr O3 = 74</i>

9/4/17 Event

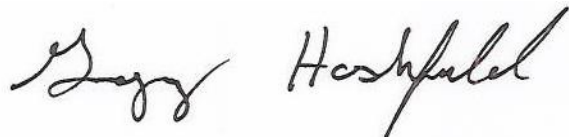
<i>Aspen Park</i>	<i>(08-059-0013)</i>	<i>9/4/17, hour 10 to hour 19</i>	<i>Max 8hr O3 = 72</i>
<i>Chatfield</i>	<i>(08-035-0004)</i>	<i>9/4/17, hour 9 to hour 19</i>	<i>Max 8hr O3 = 73</i>
<i>Highland</i>	<i>(08-005-0002)</i>	<i>9/4/17, hour 10 to hour 17</i>	<i>Max 8hr O3 = 71</i>
<i>NREL</i>	<i>(08-059-0011)</i>	<i>9/4/17, hour 7 to hour 19</i>	<i>Max 8hr O3 = 76</i>
<i>RFN</i>	<i>(08-059-0006)</i>	<i>9/4/17, hour 6 to hour 19</i>	<i>Max 8hr O3 = 78</i>
<i>Welch</i>	<i>(08-059-0005)</i>	<i>9/4/17, hour 8 to hour 19</i>	<i>Max 8hr O3 = 74</i>

The two wildfire smoke events were forecasted and documented by the APCD meteorologist for public advisories. The smoke component of these events and its significance to the observed elevated ozone concentrations has been evaluated and verified. Once the data is validated and uploaded to AQS, all 1 hour average data associated with the forward looking 8 hour averages in excess of 70 ppb will be flagged with an "RT" exclusion flag in AQS. The flagging of this data in AQS will be completed by the end of November 2017.



The APCD welcomes EPA's consideration of these events and will remain available to discuss the technical merits of our evaluation and their significance to our non-attainment classification, if requested. All subsequent exceptional event justification documents regarding these two events will be developed by APCD and submitted to EPA for concurrence. The APCD appreciates your consideration in these matters. Please feel free to contact me with questions or comments.

Regards,



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